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January 31, 2022

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Hon. Andrew L. Carter Jr.
United States District Judge
United States District Court for the
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

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MEMO ENDORSED

Re: Taveras V. Commissioner of Social Security
Docket No: 1:21-cv-06039-ALC

Hon. Judge Carter:

This letter respectfully requests an extension of time of 60 Days for Plaintiff to file their motion for Judgment on the Pleadings in this matter. Plaintiff's Brief is currently due on February 7, 2022, however, Plaintiff cannot complete the Brief on time.

The Defendant was unable to produce CARs during the early stage of the pandemic. Now the Defendant is producing 700 CARs a week and has served over a years' worth of transcripts in a very short period of time. As a result, Plaintiff's counsel has multiple simultaneous filing deadlines that cannot be met.

Plaintiff's counsel has contacted defense counsel who has kindly consented to Plaintiff's request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on April 8, 2022. The Commissioner's response would be due 60 days thereafter. Thank you for your consideration.

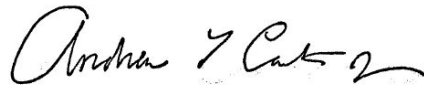
Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Susan Baird, Counsel for Defendant

SO ORDERED.

Dated: February 1, 2022



U. S. District Judge
Andrew L. Carter, Jr.